

**MEMO ENDORSED**

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 8/26/2020

**MATTHEW J. KLUGER**  
ATTORNEY AT LAW

---

888 GRAND CONCOURSE, SUITE 1H  
BRONX, NEW YORK 10451  
(718) 293-4900 • FAX (718) 618-0140  
www.klugerlawfirm.com

August 26, 2020

By ECF  
Honorable Valerie E. Caproni  
United States District Court Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**Re: United States v. Aboubakar Bakayoko**  
**19 Cr. 808 (VEC)**

Dear Judge Caproni:

I hope this letter finds the Court safe and healthy. I represent defendant Aboubakar Bakayoko in the above-referenced matter. As a condition of his bail, Mr. Bakayoko's travel is restricted to the Southern and Eastern Districts of New York. I write now seeking permission for Mr. Bakayoko to travel to North Carolina to attend his cousin's wedding from Thursday, August 27, 2020 to Sunday, August 30, 2020. A detailed travel itinerary has been provided to pretrial services under separate cover.

Pretrial Services, through PSO Mohammed Ahmed, and the Government, through AUSA Kedar S. Bhatia, *consent* to this request. Finally, I apologize to the Court for the short notice. Mr. Bakayoko advised me of his travel plans weeks ago and given my schedule, I failed to make this request sooner.

Thank you.

Respectfully,

/s/ Matthew J. Kluger  
Matthew J. Kluger

cc: AUSA Kedar S. Bhatia  
PSO Mohammed Ahmed

Due to COVID-19, North Carolina limits outdoor gatherings (excluding religious ceremonies) to 25 people and indoor gatherings to 10 people. New York requires people traveling from North Carolina to quarantine for 2 weeks upon return. Given these restrictions, Mr. Bakayoko must file a sworn statement that his cousin's wedding will comply with North Carolina's rules and that he has the capacity to quarantine upon his return to New York. If Mr. Bakayoko is employed and is working at a location other than his home, he must certify that he has discussed with his employer the fact that he will need to quarantine for 2 weeks upon return.

SO ORDERED.



8/26/2020

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE